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Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Barbara L. Major)

UNITED STATES OF AMERICA, Plaintiff, vs. Marco Antonio Contreras-Perez Defendant.	)	CASE NO. 08MJ1115 DECLARATION OF THOMAS G. GILMORE IN SUPPORT OF MOTION FOR VIDEOTAPE DEPOSITION AND SUBSEQUENT VOLUNTARY DEPORTATION OF MATERIAL WITNESSES DATE: May 20, 2008 TIME: 9:00 a.m. PLACE: Courtroom of Magistrate Barbara L. Major

I, Thomas G. Gilmore declare:

I am an attorney duly licensed to practice before all the courts of this State, District and Circuit, and am the attorney of record for the material witnesses in the above action, Ruben Lopez-Basulto, Juan Castillo-Vega and Giovani Venancio-Nieves.

I have personal knowledge of the facts set forth in this action and could testify competently thereto if called.

My clients in this action have been in federal custody since April 10, 2008 because they cannot locate anyone to post bond for them.

My clients entered the United States to find work to support family members at home in their country of origin. Each day they remain in custody is an additional hardship on themselves and their families.

Based on the above it respectfully requested that this motion be granted, that said depositions take place at the earliest possible time, and that my clients be allowed to voluntarily return home to their country of origin immediately thereafter.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own personal knowledge except as to those matters stated to be based upon information and belief and, as to those matters, I am informed and believe that they are true and correct.

Executed this 29th day of April, 2008, in San Diego, California.

/ss/ Thomas G. Gilmore
THOMAS G. GILMORE, Attorney for Material Witnesses